

THE HONORABLE JOHN H. CHUN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

N.C., individually and on behalf of A.C. a  
minor,

Plaintiff,

vs.

PREMERA BLUE CROSS;  
Defendants

Case No. 2:21-cv-01257-JHC

**JOINT STIPULATED MOTION AND  
ORDER FOR EXTENSION OF TIME TO  
FILE PROPOSED JUDGMENT IN  
REGARD TO THE COURT ORDER  
(DKT. 71)**

PREMERA BLUE CROSS (“Premera”) and N.C., individually and on behalf of A.C. a minor, (collectively the “Parties”), hereby file this Stipulation to Extend Time for the Parties to file their Proposed Judgment consistent with the Court Order at Docket Entry 71. The Parties request that the Court extend the deadline for Parties to file their Proposed Judgment to May 8, 2023. This is the first request for extension of the deadline to file a Proposed Judgment and is necessary for the parties to fully exhaust efforts to reach agreement as to the amount of the judgment.

As grounds for this motion, the Parties state that they have met and conferred regarding an extension and are in agreement that May 8, 2023 is a reasonable accommodation for Parties to resolve the amount of unpaid benefits due.

DATED this 1<sup>st</sup> day of May, 2023.

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*Counsel for Plaintiffs*

*I certify that this memorandum contains 135 words, in  
compliance with the Local Civil Rules.*

**ORDER**

Pursuant to the Stipulation,

**IT IS SO ORDERED.**

Parties shall file their PROPOSED JUDGMENT by Monday, May 8, 2023.

Dated this 2nd day of May, 2023.



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THE HONORABLE JUDGE JOHN H. CHUN  
United States District Judge

**CERTIFICATE OF SERVICE**

I certify that on the date indicated below I caused a copy of the foregoing document, JOINT STIPULATED MOTION AND ORDER FOR EXTENSION OF TIME TO FILE PROPOSED JUDGMENT IN REGARD TO THE COURT ORDER (DKT. 71), to be filed with the Clerk of the Court via the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following attorneys of record:

<b>Eleanor Hamburger</b> SIRIANNI YOUTZ SPOONEMORE HAMBURGER 3101 WESTERN AVENUE STE 350 SEATTLE, WA 98121 206-223-0303 Fax: 206-223-0246 Email: ehamburger@sylaw.com	<input checked="" type="checkbox"/> by CM/ECF <input type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery
<b>Brian Smith King</b> <b>Brent J. Newton</b> <b>Samuel Martin Hall</b> BRIAN S KING ATTORNEY AT LAW 420 E SOUTH TEMPLE STE 420 SALT LAKE CITY, UT 84111 801-532-1739 Fax: 801-532-1936 Email: brian@briansking.com Email: brent@briansking.com Email: samuel@briansking.com	<input checked="" type="checkbox"/> by CM/ECF <input type="checkbox"/> by Electronic Mail <input type="checkbox"/> by Facsimile Transmission <input type="checkbox"/> by First Class Mail <input type="checkbox"/> by Hand Delivery <input type="checkbox"/> by Overnight Delivery

DATED this 1<sup>st</sup> day of May, 2023.

KILPATRICK TOWNSEND & STOCKTON  
LLP

By: /s/ Gwendolyn C. Payton  
Gwendolyn C. Payton, WSBA #26752

*Counsel for Defendant Premera Blue Cross*